

**Commonwealth of Kentucky
Environmental and Public Protection Cabinet
Department for Environmental Protection
Division for Air Quality
803 Schenkel Lane
Frankfort, Kentucky 40601
(502) 573-3382**

**AIR QUALITY PERMIT
Issued under 401 KAR 52:040**

Permittee Name: Firestone Industrial Products LLC
Mailing Address: 1 Firestone Boulevard, Williamsburg, KY-40769

Source Name: Firestone Diversified Products
Mailing Address: 1 Firestone Boulevard
Williamsburg, KY-40769

Source Location: 1 Firestone Boulevard

Permit: S-07-097
Agency Interest: 4201
Activity: APE20070001
Review Type: Minor Source, Operating
Source ID: 21-235-00045

Regional Office: London Regional Office
875 South Main St.
London, KY - 40741
(606) 330-2080

County: Whitley

Application
Complete Date: June 27, 2007
Issuance Date: July 16, 2007
Revision Date:
Expiration Date: July 16, 2007



**John S. Lyons, Director
Division for Air Quality**

SECTION A - PERMIT AUTHORIZATION

Pursuant to a duly submitted application the Kentucky Division for Air Quality hereby authorizes the operation of the equipment described herein in accordance with the terms and conditions of this permit. This permit has been issued under the provisions of Kentucky Revised Statutes Chapter 224 and regulations promulgated pursuant thereto.

The permittee shall not construct, reconstruct, or modify any affected facilities without first submitting a complete application and receiving a permit for the planned activity from the permitting authority, except as provided in this permit or in 401 KAR 52:040, State-origin permits.

Issuance of this permit does not relieve the permittee from the responsibility of obtaining other permits, licenses, or approvals that may be required by the Cabinet or other federal, state, or local agencies.

SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS

Emission Unit	Description	Date Installed
01 (101 A)	Airide Curing Press #30 type 15	7/1/1998
(101 B)	Airide Curing Press #29 type 15	7/4/1998
(101 C)	Airide Curing Press #28 type 15	7/1/1998
02 (201 A)	Airide Curing Press #27 type 15	8/17/1998
(201 B)	Airide Curing Press #26 type 15	8/17/1998
03 (102 B)	Airide Curing Press #23 type 15	11/1/1997
(102 C)	Airide Curing Press #22 type 15	11/1/1997
04 (202 A)	Airide Curing Press #21 type 15	11/1/1997
(202 B)	Airide Curing Press #20 type 15	11/1/1997
(202 C)	Airide Curing Press #19 type 15	10/1/1997
05 (103 A)	Airide Curing Press #3 type 7	8/1/1989
(103 B)	Airide Curing Press #4 type 7	8/1/1989
(203 A)	Airide Curing Press #2 type 7	6/1/1989
(203 B)	Airide Curing Press #1 type 7	6/2/1989
06 (104 A)	Airide Curing Press #7 type 15	12/1/1989
(104 B)	Airide Curing Press #8 type 15	12/1/1989
(204 A)	Airide Curing Press #5 type 15	10/1/1989
(204 B)	Airide Curing Press #6 type 15	10/1/1989
07 (105 A)	Airide Curing Press #11 type 15	4/15/1995
(105 B)	Airide Curing Press #12 type 15	4/15/1995
(205 A)	Airide Curing Press #9 type 15	5/1/1993
(205 B)	Airide Curing Press #10 type 15	5/1/1993
08 (206 B)	Airide Curing Press #14 type 15	5/1/1993
(206 C)	Airide Curing Press #15 type 15	5/1/1993
09 (106 A)	Airide Curing Press #16 type 15	6/1/1989
(106 B)	Airide Curing Press #17 type 15	6/1/1989
(106 C)	Airide Curing Press #18 type 15	6/1/1989
10 (107 A)	Airide Curing Press #31 type 15	8/1/1998
(107 B)	Airide Curing Press #32 type 15	10/6/1998
11 (207 A)	Airide Curing Press #37 type 15	3/1/1999
(207 B)	Airide Curing Press #38 type 15	2/1/1999
(207 C)	Airide Curing Press #39 type 15	2/1/1999
12 (108 A)	Airide Curing Press #34 type 15	10/11/1998
(108 B)	Airide Curing Press #35 type 15	2/8/1999
(108 C)	Airide Curing Press #36 type 15	1/29/1999
13 (208A)	Airide Curing Press #40 type 15	2/1/1999
(208 B)	Airide Curing Press #41 type 15	2/1/1999
(208 C)	Airide Curing Press #42 type 15	2/1/1999
14 (301A)	Airide Curing Press #43 type 15	9/1/1999
(301 B)	Airide Curing Press #44 type 15	9/1/1999
(301 C)	Airide Curing Press #45 type 15	9/1/1999
15 (301A)	Airide Curing Press #46 type 15	9/1/1999
(301 B)	Airide Curing Press #47 type 15	9/1/1999
(301 C)	Airide Curing Press #48 type 15	9/1/1999

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Emission Unit	Description	Date Installed
16 (302 A)	Airide Curing Press #49 type 15	9/1/1999
(302 B)	Airide Curing Press #50 type 15	9/1/1999
(302 C)	Airide Curing Press #51 type 15	9/1/1999
(402 A)	Airide Curing Press #55 type 15	9/1/1999
17 (402 B)	Airide Curing Press #56 type 15	1/1/2006
(402 C)	Airide Curing Press #57 type 15	1/1/2006
(403 A)	Airide Curing Press #52 type 15	10/15/2005
(403 B)	Airide Curing Press #53 type 15	10/15/2005
(403 C)	Airide Curing Press #54 type 15	10/15/2005
18 (PRS4-B511)	Autosleeve – curing press	11/1/1989
(PRS4-B512)	Autosleeve – curing press	11/1/1989
(PRS4-B513)	Autosleeve – curing press	11/1/1989
19 (PRS4-B514)	Autosleeve – curing press	7/1/1990
(PRS4-B515)	Autosleeve – curing press	8/1/1990
(PRS4-B516)	Autosleeve – curing press	6/1/1991
20 (PRS4-B517)	Autosleeve – curing press	12/1/1993
(PRS4-B518)	Autosleeve – curing press	8/1/1994
(PRS4-B519)	Autosleeve – curing press	8/1/1994
21 (PRS4-B520)	Autosleeve – curing press	10/30/2000
(New)	Autosleeve – curing press	11/1/2007
22 (PRS5-B537)	Seat Spring Press	7/1/1990
(PRS5-B530)	Seat Spring press – Bag Style	7/1/1990
(PRS5-B543)	Seat Spring Curing Press	7/1/1990
(PRS5-B594)	Seat Spring 8-Station Press	10/1/2000
(PRS5-B614)	Seat Spring Station Curing Press	11/1/2005
(New)	Press	11/1/2007
(New)	Press	11/1/2007
(PRS5-B588)	Seat Spring 2M2A Curing Press	7/1/1990
(PRS5-B562)	Seat Spring Ministoke Curing Press	8/1/1990
(PRS5-B700)	Bladder & Sleeve Press	9/15/1999
(PRS5-B701)	Bladder & Sleeve Press	10/1/1999
(PRS5-B702)	Bladder & Sleeve Press	10/28/2002
(PRS5-B703)	Bladder & Sleeve Press	7/20/2003
(PRS5-B704)	Bladder & Sleeve Press	7/20/2003
(PRS5-B705)	Bladder & Sleeve Press	7/20/2003
23 (CLS7-P500C)	Calendar 3 Roll Vertical	2/1/1992
(MIS7-P501A)	Calendar 84”Rubber Breakdown Mill	2/1/1992
(MIS7-P502A)	Calendar 60”Rubber Feed Mill	2/1/1992
30 (New)	4 Roll Z Calendar	Fall 2007
(New)	Calendar 84”Rubber Breakdown Mill	Fall 2007
(New)	Calendar 60” Rubber Feed Mill	Fall 2007

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

APPLICABLE REGULATIONS:

401 KAR 59:010 – New process operations applies to particulate emissions from each affected facility commenced on or after July 2, 1975.

1. Operating Limitations:

None.

2. Emission Limitations:

- a. 401 KAR 59:010 § 3(1), continuous opacity emissions from a control device or a stack shall be less than twenty (20) percent
- b. 401 KAR 59:010 § 3(2), particulate matter emissions from a control device or a stack shall not exceed 2.34 pounds per hour.

Compliance Demonstration Method for Emission Limitations A:

Compliance with the opacity standards shall be determined by the permittee performing a qualitative visual observation of the opacity of emissions at each stack no less than weekly and maintaining a log of the observations. If visible emissions from the stacks are seen (not including condensed water in the plume), then an inspection of process equipment shall be initiated and corrective action taken. If visible emissions are present after the corrective action, the process shall be shut down and shall not operate again until repairs have been made that result in no visible emissions from the process during operation. In lieu of shutting the process down, the permittee may determine the opacity using Reference Method 9. If the opacity limit is not exceeded, the process may continue to operate.

Compliance Demonstration Method for Emission Limitations B:

Compliance with the mass standards will be assumed unless testing is required, when the units are in compliance with the opacity standards.

3. Testing Requirements:

None.

4. Monitoring Requirements:

- a. The permittee shall monitor the monthly use of chemicals in pounds.
- b. The permittee shall monitor the monthly hours of operation.
- c. The permittee shall monitor the opacity emissions from each stack weekly as described above.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

5. Recordkeeping Requirements:

- a. The permittee shall maintain a log of the monthly and annual chemicals used in pounds.
- b. The permittee shall maintain a log of the monthly and annual hours of operation.
- c. The permittee shall maintain a weekly log of visual observations of the opacity of emissions.
- d. The permittee shall maintain records of any corrective actions taken as a result of the presence of visible emissions being detected during an observation.
- e. The permittee shall maintain records of the results of any Method 9 readings performed.

6. Reporting Requirements:

See Section C.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Emission Unit	Description	Date Installed
25 (STS1-M111)	Steam Generator 150HP (4.2 MMBtu/hr) Natural Gas Fired	12/1/1989
26 (STS1-M112)	Steam Generator 150HP (6 MMBtu/hr) Natural Gas Fired	12/1/1989
27 (STS1-M126)	Steam Generator 300HP (10.03 MMBtu/hr) Natural Gas Fired	1/1/1992
28 (STS1-M128)	Steam Generator 500HP (20.09 MMBtu/hr) Natural Gas Fired	12/1/1997

APPLICABLE REGULATIONS:

401 KAR 59:015 – Applicable to an indirect heat exchanger with a capacity of 250 MMBtu/hr heat input or less commenced on or after April 9, 1972.

401 KAR 60:005, incorporating by reference 40 CFR 60 Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, applicable to an emission unit with a design maximum heat input capacity of 100 MMBtu/hr or less and greater than or equal to 10 MMBtu/hr and constructed after June 9, 1989.

1. Operating Limitations:

None

2. Emission Limitations:

- a. Pursuant to 401 KAR 59:015 § 4(1) (c), particulate matter emission rate from each affected facility shall not exceed 0.43 lb/MMBtu, based on three hour average.
- b. Pursuant to 401 KAR 59:015, Section 4(2), emissions shall not exceed 20% opacity based on a six-minute average, except a maximum of 40% opacity, based on six minutes average, shall be permissible for not more than 6 consecutive minutes in any consecutive 60 minutes during cleaning the fire-box or blowing soot.
- c. Pursuant to 401 KAR 59:015 § 5(1)(c), sulfur dioxide emission rate from each affected facility shall not exceed 1.88 lb/MMBtu, based on twenty-four hour average.
- d. Pursuant to 401 KAR 59:015, § 4(2)(c), for emissions shall not exceed 20 % opacity based on a six minute average, except for emissions from an indirect heat exchanger during building a new fire for the period required to bring the boiler up to operating condition provided the method used is the recommended by the manufacturer and the time does not exceed the manufacturer's recommendations.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

- e. Pursuant to 401 KAR 60:005, incorporating by reference 40 CFR 60.43c (d), the PM and opacity standards apply at all times except during periods of startup, shutdown, or malfunction.

Compliance Demonstration Method:

These unit are considered to be in compliance with the PM, SO₂, and opacity standards while burning natural gas

3. Testing Requirements:

None.

4. Monitoring Requirements:

- a. The permittee shall monitor the monthly natural gas use.
- b. The permittee shall monitor the monthly hours of operation.

5. Recordkeeping Requirements:

- a. The permittee shall maintain a log of the monthly and annual natural gas usage.
- b. The permittee shall maintain a log of the monthly and annual hours of operation.
- c.. The permittee shall maintain records of activities on boilers as specified by manufacturer's recommendations.

6. Reporting Requirements:

See Section C.

SECTION C - GENERAL CONDITIONS

1. Administrative Requirements

- a. The permittee shall comply with all conditions of this permit. Noncompliance shall be a violation of 401 KAR 52:040, Section 3(1)(b) and is grounds for enforcement action including but not limited to the termination, revocation and reissuance, or revision of this permit.
- b. This permit shall remain in effect for a fixed term of ten (10) years following the original date of issue. Permit expiration shall terminate the source's right to operate unless a timely and complete renewal application has been submitted to the Division at least six months prior to the expiration date of the permit. Upon a timely and complete submittal, the authorization to operate within the terms and conditions of this permit, including any permit shield, shall remain in effect beyond the expiration date, until the renewal permit is issued or denied by the Division. [401 KAR 52:040, Section 15]
- c. Any condition or portion of this permit which becomes suspended or is ruled invalid as a result of any legal or other action shall not invalidate any other portion or condition of this permit [Section 1a-11 of the *Cabinet Provisions and Procedures for Issuing State-Origin Permits* incorporated by reference in 401 KAR 52:040 Section 23].
- d. Pursuant to materials incorporated by reference by 401 KAR 52:040, this permit may be revised, revoked, reopened, reissued, or terminated for cause. The filing of a request by the permittee for any permit revision, revocation, reissuance, or termination, or of a notification of a planned change or anticipated noncompliance shall not stay any permit condition [Section 1a-4, 5, of the *Cabinet Provisions and Procedures for Issuing State-Origin Permits* incorporated by reference in 401 KAR 52:040 Section 23].
- e. This permit does not convey property rights or exclusive privileges [Section 1a-8 of the *Cabinet Provisions and Procedures for Issuing State-Origin Permits* incorporated by reference in 401 KAR 52:040 Section 23].
- f. Nothing in this permit shall alter or affect the liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance [401 KAR 52:040 Section 11(3)].
- g. This permit shall be subject to suspension at any time the permittee fails to pay all fees within 90 days after notification as specified in 401 KAR 50:038, Air emissions fee. The permittee shall submit an annual emissions certification pursuant to 401 KAR 52:040, Section 20.

SECTION C - GENERAL CONDITIONS (CONTINUED)**2. Recordkeeping Requirements**

- a. Records of all required monitoring data and support information, including calibrations, maintenance records, and original strip chart recordings, and copies of all reports required by the Division for Air Quality, shall be retained by the permittee for a period of at least five years and shall be made available for inspection upon request by any duly authorized representative of the Division for Air Quality [401 KAR 52:040 Section 3(1)(f) and Section 1b-IV-2 of the *Cabinet Provisions and Procedures for Issuing State-Origin Permits* incorporated by reference in 401 KAR 52:040 Section 23].
- b. The permittee shall perform compliance certification and recordkeeping sufficient to assure compliance with the terms and conditions of the permit. Documents, including reports, shall be certified by a responsible official pursuant to 401 KAR 52:040, Section 21.

3. Reporting Requirements

- a. (1) In accordance with the provisions of 401 KAR 50:055, Section 1, the permittee shall notify the Regional Office listed on the front of this permit concerning startups, shutdowns, or malfunctions as follows:
 - i. When emissions during any planned shutdowns and ensuing startups will exceed the standards, notification shall be made no later than three (3) days before the planned shutdown, or immediately following the decision to shut down, if the shutdown is due to events which could not have been foreseen three (3) days before the shutdown.
 - ii. When emissions due to malfunctions, unplanned shutdowns and ensuing startups are or may be in excess of the standards, notification shall be made as promptly as possible by telephone (or other electronic media) and shall be submitted in writing upon request.
- (2) The permittee shall promptly report deviations from permit requirements including those attributed to upset conditions (other than emission exceedances covered by Reporting Requirement condition a.(1) above), the probable cause of the deviation, and corrective or preventive measures taken; to the Regional Office listed on the front of this permit within 30 days. Other deviations from permit requirements shall be included in the semiannual report [Section 1b-V-3 of the *Cabinet Provisions and Procedures for Issuing State-Origin Permits* incorporated by reference in 401 KAR 52:040 Section 23].
- b. The permittee shall furnish information requested by the Cabinet to determine if cause exists for modifying, revoking and reissuing, or terminating the permit; or to determine compliance with the permit [Section 1a-6 of the *Cabinet Provisions and Procedures for Issuing State-Origin Permits* incorporated by reference in 401 KAR 52:040 Section 23].
- c. Summary reports of monitoring required by this permit shall be submitted to the Regional Office listed on the front of this permit at least every six (6) months during the life of this permit. For emission units that were still under construction or which had not commenced operation at the end of the 6-month period covered by the report and are subject to monitoring requirements in this permit, the report shall indicate that no monitoring was performed during the previous six months because the emission unit was not in operation. The summary reports

SECTION C - GENERAL CONDITIONS (CONTINUED)

are due January 30th and July 30th of each year. All deviations from permit requirements shall be clearly identified in the reports. All reports shall be certified by a responsible official pursuant to 401 KAR 52:040, Section 21.

4. Inspections

In accordance with the requirements of 401 KAR 52:040, Section 3(1)(f) the permittee shall allow authorized representatives of the Cabinet to perform the following during reasonable times. Reasonable times are defined as during all hours of operation, during normal office hours; or during an emergency:

- a. Enter upon the premises to inspect any facility, equipment (including air pollution control equipment), practice, or operation.
- b. To access and copy any records required by the permit.
- c. Inspect, at reasonable times, any facilities, equipment (including monitoring and pollution control equipment), practices, or operations required by the permit.
- d. Sample or monitor, at reasonable times, substances or parameters to assure compliance with the permit or any applicable requirements.

5. Emergencies/Enforcement Provisions

- a. The permittee shall not use as defense in an enforcement action, the contention that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance [Section 1a-3 of the *Cabinet Provisions and Procedures for Issuing State-Origin Permits* incorporated by reference in 401 KAR 52:040 Section 23].
- b. An emergency shall constitute an affirmative defense to an action brought for the noncompliance with the technology-based emission limitations if the permittee demonstrates through properly signed contemporaneous operating logs or relevant evidence that:
 - (1) An emergency occurred and the permittee can identify the cause of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During an emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and
 - (4) The permittee notified the Division as promptly as possible and submitted written notice of the emergency to the Division within two working days after the time when emission limitations were exceeded due to the emergency and included a description of the emergency, steps taken to mitigate emissions, and corrective actions taken.
- c. Emergency provisions listed in General Condition 5.b are in addition to any emergency or upset provision contained in an applicable requirement [401 KAR 52:040, Section 22(1)].
- d. In an enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof. [401 KAR 52:040, Section 22(2)].

SECTION C - GENERAL CONDITIONS (CONTINUED)**6. Compliance**

- a. Periodic testing or instrumental or non-instrumental monitoring, which may consist of record keeping, shall be performed to the extent necessary to yield reliable data for purposes of demonstration of continuing compliance with the conditions of this permit. For the purpose of demonstration of continuing compliance, the following guidelines shall be followed:
 - (1) Pursuant to 401 KAR 50:055, General compliance requirements, Section 2(5), all air pollution control equipment and all pollution control measures proposed by the application in response to which this permit is issued shall be in place, properly maintained, and in operation at any time an affected facility for which the equipment and measures are designed is operated, except as provided by 401 KAR 50:055, Section 1.
 - (2) All the air pollution control systems shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers. A log shall be kept of all routine and nonroutine maintenance performed on each control device. Daily observations are required during daylight hours of all operations, control equipment and any visible emissions to determine whether conditions appear to be either normal or abnormal. If the operations, controls and/or emissions appear to be abnormal, the permittee must then comply with the requirements of Section C – General Conditions, 3.a.(2), of this permit.
 - (3) A log of the monthly raw material consumption and monthly production rates shall be kept available at the facility. Compliance with the emission limits may be demonstrated by computer program, spread sheets, calculations or performance tests as may be specified by the Division [401 KAR 50:055, Section 2].
- b. Pursuant to 401 KAR 52:040, Section 19, the permittee shall certify compliance with the terms and conditions contained in this permit by January 30th of each year, by completing and returning a Compliance Certification Form (DEP 7007CC) (or an approved alternative) to the Regional Office listed on the front of this permit in accordance with the following requirements:
 - (1) Identification of the term or condition;
 - (2) Compliance status of each term or condition of the permit;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The method used for determining the compliance status for the source, currently and over the reporting period, and
 - (5) For an emissions unit that was still under construction or which has not commenced operation at the end of the 12-month period covered by the annual compliance certification, the permittee shall indicate that the unit is under construction and that compliance with any applicable requirements will be demonstrated within the timeframes specified in the permit.

SECTION C - GENERAL CONDITIONS (CONTINUED)

- (6) The certification shall be postmarked by January 30th of each year. Annual compliance certifications shall be mailed to the following addresses:

Division for Air Quality
London Regional Office
875 South Main St
London, KY 40741

Division for Air Quality
Central Files
803 Schenkel Lane
Frankfort, KY 40601-1403

- c. Permit Shield - A permit shield shall not protect the owner or operator from enforcement actions for violating an applicable requirement prior to or at the time of permit issuance. Compliance with the conditions of this permit shall be considered compliance with all:
- (1) Applicable requirements that are included and specifically identified in this permit; or
 - (2) Non-applicable requirements expressly identified in this permit [401 KAR 52:040, Section 11].

SECTION D - INSIGNIFICANT ACTIVITIES

The following listed activities have been determined to be insignificant activities for this source pursuant to 401 KAR 52:040, Section 6. While these activities are designated as insignificant the permittee shall comply with the applicable regulation and any level of periodic monitoring specified below.

<u>Description</u>	<u>Generally Applicable Regulation</u>
1. Laser etch and product marking device	401 KAR 59:010
2. 44 natural gas fired space heaters Total 8.65 MMBtu/hr	401 KAR 59:010
3. Diesel fire Pump	401 KAR 59:010